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**Summary
Interim Report
Task Force ...Ont. Human
Rights Code**

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Ont. [Task force]

SUMMARY
OF THE
INTERIM REPORT OF THE TASK FORCE ON
SECTION 4 (1) (g) OF THE ONTARIO
HUMAN RIGHTS CODE.



OCTOBER, 1974

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INTRODUCTION

- In June 1972, the Ontario Human Rights Code was amended to add sex, marital status, and age, to the provision prohibiting discrimination against employees with regard to any term or condition of employment.
- A special provision was added to provide for delayed proclamation of that part of Section 4(1)(g) that applies to "any bona fide super-annuation or pension fund or plan or any bona fide insurance plan that provides life, accident, sickness or disability insurance or benefits."
- A Task Force was appointed in January 1973 to examine and report upon the anticipated impact of bringing this delayed part of Section 4(1)(g) into force.
- The Interim Report of the Task Force is 152 pages long, and contains 84 recommendations made by the majority of the members. This summary has been prepared for general readership in the hope that it will stimulate discussion and written responses to the Deputy Minister of Labour by November 22, 1974.
- Although this Summary attempts to accurately highlight the recommendations in the Interim Report, it is not intended to be exhaustive, nor the final authority on the subject. Copies of the Interim Report of the Task Force on Section 4(1)(g) of the Ontario Human Rights Code may be obtained from the Queen's Printer, Queen's Park, Toronto.

BACKGROUND

For the purposes of the Interim Report, an employee benefit plan is any formalized program established by an employer to provide benefits such as pension benefits, life insurance benefits, disability income benefits, or sickness and accident insurance benefits for employees. Most employee benefit plans are financed through an insurance contract, but employers sometimes provide self-insured benefits, such as sick pay plans.

THE BORGES COLLECTION

and the old books are now kept under glass at the top of the
main staircase. The collection includes over 10,000 volumes, mostly
in English, and covers all fields of literature.

The library has a large collection of books on collecting. A
large number of books on antique collecting, including
books on early manuscripts, prints and drawings, and
books on coins and medals.

The library also has a large collection of books on
the history of art, including books on painting, sculpture,
architecture, and decorative arts.

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SEX-BASED DIFFERENTIALS

- All of the 12 labour jurisdictions in Canada, except the Federal, Prince Edward Island, and the Yukon Territory, prohibit discrimination on the basis of sex under their human rights legislation.
- Although several provinces have settled a few complaints involving sex-based differences in employee benefit plans, New Brunswick is the only Human Rights Commission that has issued comprehensive guidelines in this area.
- There are many sex-based differentials in current Employee benefit plans, although the Task Force's research indicated that there is a trend towards removal of these differences. The most frequently cited examples of sex-based discrimination are as follows:-
 - * In the pension area, it is still common to find different pensionable ages for men and women; while plans that provide widows' benefits rarely provide widowers' benefits.
 - * Group life insurance plans sometimes provide higher levels of coverage for men than for women.
 - * Absence due to pregnancy or pregnancy-related illness is usually excluded from disability plans. Some weekly indemnity plans provide less income maintenance for women than they do for men.
 - * Premium assistance for health and medical insurance is often lower for married women than for married men.

MARITAL STATUS-BASED DIFFERENTIALS

- In addition to Ontario, only four other provinces (British Columbia, Alberta, New Brunswick, and the Northwest Territories) prohibit employment discrimination on the basis of marital status. As with sex-based discrimination, the New Brunswick Human Rights Commission is the only administering agency that has issued interpretative guidelines in relation to Employee benefit plans.
- Common differentials based on marital status are as follows:-
 - * Pension plans that provide spouses' benefits rarely if ever provide equivalent benefits for "single" employees, (i.e. unmarried, widowed, divorced, separated).
 - * Group life insurance plans sometimes provide higher levels of coverage for married than for single employees.
 - * A few weekly indemnity plans provide less income maintenance for single than for married employees.
 - * Health and medical insurance plans are structured around the family unit, as defined by marital status. In addition, premium assistance sometimes varies by marital status.

AGE-BASED DIFFERENTIALS

- In addition to Ontario, only four other provinces (British Columbia, Alberta, New Brunswick, and Newfoundland) prohibit employment discrimination on the basis of age. In all jurisdictions, except New Brunswick, "age" is defined as between 40 and 65 years.
- However, in all of the above jurisdictions except Ontario, the age discrimination provisions do not apply to pensions and other employee benefit plans.

- In reviewing discrimination on the basis of age, the Task Force makes a distinction between retirement date and pensionable date. The former is the date at which employment ceases; while the latter is the date at which pension is available (whether normal, early, postponed, or disability pension). Compulsory retirement dates below the age of 65 years are already prohibited under Section 4(1)(b) of the Code.
- The major age-based differentials that the Task Force considered are:-
 - * About 1 in 3 pension plans have maximum eligibility ages for enrollment below the age of 65 years, so that many older workers who change employers do not have access to pension plan membership.
 - * Group life insurance plans sometimes reduce the level of available coverage with increasing age.
 - * Long-term disability coverage is sometimes withdrawn below the age of 65 years.

KEY ISSUES

The Interim Report draws attention to two key issues, that were contained in the briefs and considered by the members:

- A. Mortality and Morbidity: Statistical Averages and Classifications
- Many of the differentials in employee benefits are due to actuarial cost factors.
- The actuarial costing of employee benefit programs utilizes group differences in mortality and morbidity, that vary significantly by sex and age. The Task Force Report proposes that statistical averages and classifications may be applied to the overall costing of benefit programs but that, in general, these group differences should not be applied to individual employees, whether in terms of employee benefits or employee contributions. It is recommended that,

in general, any additional actuarial costs due to sex and age that are required to produce Equal benefit schedules should be shared by all employees, or else borne by the employer.

B. Real versus Assumed Needs

Many of the differentials in employee benefits are not due to cost, but to traditional assumptions about the needs of employees. The Task Force Report proposes that assumptions of need on the group bases of sex, age, and to a lesser extent marital status, are contrary to the concept of individual human rights. It is recommended that, in general, benefits should be awarded either without any reference to needs, or else on the basis of the real needs of individuals.

BASIC CONCLUSIONS AND EXCEPTIONS

- The Interim Task Force Report recommends implementation of the principle of equal employee benefits by April 1, 1975. It is further proposed that Section 4(1)(g) be supplemented by amendments, and regulations embodying the detailed aspects of enforcement.
- The members of the Task Force took a pragmatic approach to the complex area of employee benefits and their Report recognizes the necessity of several exceptions to the principle of Equal benefits which, following public response, could be built into the regulations.
- There are three types of exceptions contained in the recommendations; actuarial exceptions; exceptions based on need, and administrative exceptions.

a) Actuarial Exceptions

- The Task Force Report adopts the general principle that, although group differences in mortality and morbidity based on age and sex will be allowed for the overall costing of benefit plans, they shall not be applied to individual employees' costs or benefits. In other words, equal benefit levels and equal employee costs are recommended as the usual criteria of fairness.
- However, the Report proposes actuarial differences may be applied to individual employees' benefits or costs, but not both, in some cases where re-adjustment of traditional plan structure would be disruptive.
- For example, it is recommended that benefits under money-purchase pension plans or features may continue to vary by sex and age. Only 6% of all pension plan members are enrolled in money-purchase and related pension plans. They are popular with small employers because of their administrative simplicity so that requiring a more complex defined-benefit approach could lead to termination of many pension plans.

b) Needs Exceptions

- The Task Force Report proposes the general principle that employee benefits should not be awarded on the basis of assumed needs, where sex, marital status or age are used as an indicator of need.
- However, the Report proposes that benefits may be based on assumed needs in those cases where these assumptions are socially acceptable and where removal of existing benefits could cause hardship.

- For example, it is recommended that survivor benefits to spouses may continue to be awarded automatically on the basis of marital status. In other words, survivor benefits to other than spouses need not be awarded to other categories of adult survivors, such as, aged parents or disabled siblings; nor need survivor benefits be converted into lump-sum equivalents for "single" employees' estates.

c) Administrative Exceptions

- In general, the Task Force Report proposes that increased costs or administrative difficulties should not be considered a justifiable barrier to the equalization of employee benefits.
- However, some practical exceptions to this principle are recommended; particularly in relation to existing legislation.
- For example, some briefs suggested that statutory vesting of pensions should be available at age 40, instead of the current 45, because the Code defines "age" as between 40 and 65. The Task Force Report recommends that the Pension Benefits Act of Ontario be given precedence over the Code, because different statutory vesting provisions in Ontario would conflict with the pension legislation's goal of inter-provincial uniformity.

SUMMARY OF RECOMMENDATIONS

GENERAL RECOMMENDATIONS

- S-1) *That Section 4 (1)(g) be amended to ensure that it applies to voluntary employee benefits.
If voluntary plans discriminate, employees do not have access to non-discriminatory alternatives. Limited application to compulsory benefits only could therefore create a serious "loophole".
- S-2) Available maximum benefit schedules under voluntary employee-pay-all plans, or features of plans, shall not vary by sex or age, but employee contributions to these plans shall be allowed to vary by age and sex on an actuarial basis. Under a voluntary employee-pay-all plan, low risk employees would be unwilling to subsidize high risk employees; thus creating anti-selection problems.
- S-3) "Head-of-Household" and related criteria shall not be permitted in any aspect of benefit design.
Criteria that attempt to identify one spouse as the primary "breadwinner" tend to unfairly favour male employees.
- S-4) Benefits shall be allowed to vary on the basis of other differentials, provided that they do not evade the intent of the Code. Differentials based on salary or occupational category may compound differences due to the division of labour by sex, but they are not inherently discriminatory. Similarly, differentials based on seniority are not inherently discriminatory even though they may compound age-based differences.

SPECIFIC RECOMMENDATIONS

- S-5) Access to an eligibility requirements for benefit plans shall not vary by sex, marital status or age except:
where there is a normal pensionable date below 65 and existing employees above this age cannot continue to accrue pension benefits or continue their long-term disability coverage. In these circumstances, new employees above the normal pensionable date may be denied access to pension plan membership and long-term disability coverage.

* The recommendations in the summary have a prefix S, to prevent confusion with the numbering of the recommendations in the Interim Report.

S-6) Employee benefit schedules shall not vary by sex, marital status, or age except that:

- a) benefit schedules under money-purchase and related pension plans shall be allowed to vary by sex and age on an actuarial basis.

This is an actuarial and administrative exception based on the practical difficulty of adapting these types of pension plans to a define-benefit approach.

- b) elective options, early and postponed benefit schedules under all pension plans shall be allowed to vary by sex and age on an actuarial basis.

These are actuarial and administrative exceptions. If elective options could not be provided on a money-purchase basis, then they would be eliminated or curtailed. Similarly, the difficulty of transferring from actuarial to formula adjustments in the event of early or postponed retirement could result in the elimination of flexibility in pensionable dates.

- c) available maximum benefit schedules under voluntary life insurance plans or features shall be allowed to vary by age.

This is a needs exception based on the premise that, although basic compulsory life insurance coverage should not decline with age, most employees' extra voluntary life insurance needs do tend to decline with age.

The recommendations concerning age and life insurance mean that three combinations of benefit schedules and Employee contribution rates are possible:

i) Under compulsory life insurance plans, whether Employee-pay-all or not, neither benefit schedules or Employee contribution rates should vary by age.

ii) Under voluntary, Employer-contributory life insurance plans the available maximum benefit schedules may vary by age, but not the Employee purchase cost.

iii) Under voluntary, Employee-pay-all life insurance plans both the available maximum benefit schedules and the Employee purchase cost may vary by age.

- d) benefits under all pension plans shall be allowed to vary by age according to The Pension Benefits Act of Ontario.

This is an administrative and actuarial exception. There are variations in pension benefit levels on the basis of age, due to the fact that accrual rates are allowed to vary by age. However, the extent of this variation is controlled by The Pension Benefits Act of Ontario, in order to ensure reasonably uniform accrual of benefits for each year of service.

S-7) Access to and level of dependency and/or survivor benefits shall not vary by sex, marital status, or age except that:

- a) benefit levels under money-purchase and related pension plans shall be allowed to vary actuarially by the sex and age of the employee.

This exception is based on the same premise as the actuarial and administrative exception of primary employee benefits under recommendation 6 a) above.

- b) Inter-vivos* pension benefits in respect of dependent adults shall be allowed to vary by marital status with regard to dependent spouses only.

This is a needs exception based on the social acceptability of extra benefits for spouses, but only where there is real need. This means that these kinds of pension benefits need not be extended in respect of dependent adults other than spouses. However, they cannot be awarded in respect of all spouses on an automatic basis, because real dependency should be established on an individual basis.

- c) access to health and medical insurance benefits related to dependent adults shall be allowed to vary by marital status.

This is an administrative exception that recognizes that OHIP and extended medical insurance is structured around the family unit, as defined by marital status. In other words, unrelated adults should not be eligible for family coverage, unless they qualify as "common-law" spouses.

- d) survivor benefits to adults under pension plans shall be allowed to vary by marital status.

- e) income benefits for adult survivors under life insurance plans shall be allowed to vary by marital status.

The above two exceptions are based on the social acceptability of the needs of surviving spouses. Accordingly, these kinds of benefits can be awarded to all spouses on an automatic basis, irrespective of individual need.

S-8) Employee contribution rates shall not vary by sex, marital status, or age except that:

- a) employee contribution rates to any voluntary employee-pay-all plans shall be allowed to vary by sex and age on an actuarial basis (see recommendation No. 2)

* Inter-vivos dependency benefits are increased benefits that are first payable during an employees' lifetime in respect of his or her dependent/s. For example, extra disability benefits for married Employees. They differ from survivor benefits, which are first payable after an employee's death.

- b) employee contribution rates for surviving spouses' income benefits under life insurance plans, and dependent spouses' benefits under health and medical insurance plans, shall be allowed to vary by marital status.

Since the Interim Report allows for extra benefits for married employees under recommendations 7), above, it is reasonable that married employees may have to make extra contributions for these benefits.

- c) employee contribution rates under money-purchase and related pension plans shall be allowed to vary by age.

- d) voluntary employee contribution rates under pension plans shall be allowed to vary by age.

The above two exceptions are based on actuarial and administrative reasons. It is a rare, but accepted practice under money-purchase and related pension plans to allow employee contribution levels to increase with age as a means of approximating defined-benefit plans, and providing better pensions at retirement. Additional voluntary pension plans are usually provided on a money-purchase principle, so that most employees wish to increase their contributions with age in order to improve their pension benefits.

- e) voluntary contributions under life insurance plans shall be allowed to vary in relation to the age-based differences in the benefit schedules available:

This is an administrative exception resulting from recommendation 6 c), above. It should be noted that employee contributions to voluntary life insurance should not vary on an actuarial basis, except in the case of employee-pay-all plans.

- S-9) Employer contributions shall be allowed to vary by age and sex on an actuarial basis only, and only in order to achieve equal benefits, except that:

- a) employer contributions to all pension plans shall be allowed to vary by age according to the Pension Benefits Act of Ontario.

This is an administrative recommendation that recognizes that existing provincial legislation allows employer pension contributions to vary by age on other than an actuarial basis.

- S-10) Employer contributions shall not vary by marital status except that:

- a) employer contributions to pension and life insurance plans shall be allowed to vary by marital status in order to provide for surviving spouses' benefits.

- b) employer contributions to pension plans shall be allowed to vary by marital status in order to provide for dependent spouses' benefits.

The above two exceptions are based on needs and administrative considerations. Since employers are allowed to provide extra benefits for their married employees under recommendation 7), above, then it is reasonable to expect employers, rather than their single employees, to subsidize these additional benefits.

- c) employer contributions to health and medical insurance plans shall be allowed to vary by marital status, but only in proportion to the differences in required contribution rates.

This administrative exception follows from recommendation 7 c), above. Married employees should not be given a proportionately higher subsidy for the specified contribution rates for "family" and "single" coverage. Contribution assistance should be equal, either in terms of the same flat dollar amount, or the same proportion of different contribution rates.

MISCELLANEOUS RECOMMENDATIONS

S-11) Eligibility ages for early, postponed and normal pensionable dates, compulsory retirement dates, disability or death benefits, and vesting ages shall not vary by sex.

S-12) Disability due to pregnancy complications or to unrelated disability that occurs during pregnancy shall not be excluded from short or long-term disability coverage.

Partial income maintenance is usually available under U.I.C. for absence due to normal pregnancy, and there is an element of choice about pregnancy that does not apply to other temporary disabilities. However, pregnancy complications or coincidental sickness are certainly not voluntary, and their exclusion can cause undue hardship for women employees.

S-13) Reimbursement of costs under extended health insurance programs shall not vary by sex, including the exclusion of costs arising out of pregnancy.

S-14) "Single" parents and their children shall have the same status as married parents and their children.

It is unfair if the children of "single" parents, whether divorced, widowed, separated, or unmarried, do not have access to the same benefits as the children of married persons, because their needs are the same.

S-15) "Common-law" spouses as defined in the terms of each plan shall have the same status as legally married spouses.

The needs of "common-law" spouses are given limited recognition under social security legislation and under some of the major statutory pension plans. In view of these precedents, "common-law" spouses should be deemed to have married status for all aspects of employee benefit design. However, the Interim Report does not recommend the imposition of a single definition of a valid "common-law" relationship, but prefers to leave this for definition under the terms of each plan.

S-16) Vesting shall be allowed to vary by age according to the Pension Benefits Act of Ontario.

This is an administrative exception explained on page 7 of this summary.

S-17) Pensionable dates shall be allowed to vary by age.

Some briefs suggested that specified pensionable dates below the age of 65 years should be available at all ages between 40 and 65. The Interim Report does not consider that this was the intent of Section 4 (1)(g).

ADMINISTRATIVE RECOMMENDATIONS

S-18) Where pensionable dates are equalized, they shall be allowed to move in any direction.

Some briefs suggested that, where women have a lower normal pensionable date than men, the Human Rights Code should require that the lower pensionable date be taken as the new equal pensionable date for all employees. The Interim Report does not consider it appropriate to make any requirements concerning the direction of the equalization of pensionable dates.

S-19) Accrued pension benefits shall be protected, but future pension benefits shall be allowed to change according to the new terms of the plan.

New accrual rates due to equalization should not be applied retroactively, and existing plan members should retain the right to retire at the pensionable date/s that they had expected. However, the Interim Report does not consider it economically feasible to require the continuation of existing accrual rates in the future, even in those circumstances where they would be more favourable than the new accrual rates. For example, where women had higher accrual rates than men, that were associated with earlier pensionable dates, these more favourable rates need not be extended to men, and they may be reduced for women in the future.

S-20) With the exception of pension plans, and bona fide reorganizations approved by the administering agency, existing employee benefits shall be protected.

Employers should not be allowed to reduce existing benefits in order to equalize them unless there is a valid need for flexibility in the redesign of the benefit program. In the latter case, individual exemptions would have to be approved by the administering agency.

S-21) The Minister of Labour should consider the advisability of transferring the administration of Section 4 (1)(g) from the Human Rights Commission to the Employment Standards Branch, and also explore the advisability of complementary enforcement by other provincial government agencies.

S-22) April 1, 1975, shall be the date on which amended Section 4 (1)(g) is proclaimed in effect.

SUMMARY OF RECOMMENDATIONS CONCERNING DISCRIMINATION ON THE BASIS OF SEX

		INSURANCE		
		PENSIONS	LIFE	SHORT OR LONG-TERM DISABILITY
				HEALTH OR MEDICAL
ACCESS AND ELIGIBILITY REQUIREMENTS	Shall not vary by sex			Shall not vary by sex or "head-of-household" and related criteria.
EMPLOYEE BENEFITS	<u>Defined-benefit plans</u>	Money-purchase, Profit-sharing, Composite & voluntary additional plans	Shall not vary by sex or "head-of-household" and related criteria.	Shall not vary by sex or "head-of-household" and related criteria.
	<u>Normal Service & disability benefits</u>	Benefit levels shall be allowed to vary by sex on an actuarial basis only		Shall not vary by sex.
		Elective options, early and postponed benefits shall be allowed to vary by sex on an actuarial basis only		
DEPENDENCY AND/OR SURVIVOR BENEFITS	<u>Access shall not vary by the sex of the employee</u>	Shall not vary by the sex of the employee or "head-of-household" and related criteria.		Shall not vary by the sex of the employee.
	<u>Defined-benefit plans</u>	Money-purchases, Profit-sharing & composite plans		
		Benefit schedules shall not vary by the sex of the employee on an actuarial basis only		
		Age of eligibility for early, postponed, normal, compulsory, disability or death benefits, and vesting age shall not vary by sex.		
MISCELLANEOUS	<u>Compulsory contribution rates</u>	Contribution rates shall not vary by sex	Shall not vary by sex, except for voluntary employee-pay-all plans or features, where they shall be allowed to vary on an actuarial basis only.	Reimbursement of costs under extended health programs shall not vary by sex, and reimbursement shall include costs arising out of pregnancy.
	<u>Voluntary contribution rates</u>	Contribution levels shall not vary by sex	Shall not vary by sex, except for voluntary employee-pay-all plans or features, where they shall be allowed to vary on an actuarial basis only.	Shall not vary by sex or "head-of-household" and related criteria.
EMPLOYER CONTRIBUTION RATES	Shall be allowed to vary by sex on an actuarial basis only, and only in order to achieve equal benefits.	Shall be allowed to vary by sex on an actuarial basis only, and only in order to achieve equal benefits.	Shall be allowed to vary by sex on an actuarial basis only.	Shall not vary by sex or "head-of-household" and related criteria.

SUMMARY OF RECOMMENDATIONS CONCERNING DISCRIMINATION ON THE BASIS OF MARITAL STATUS

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	PENSIONS	LIFE	SHORT & LONG-TERM DISABILITY	INSURANCE	HEALTH AND MEDICAL
GENERAL	Employees with dependent children shall have the status of married employees, and all dependent children of employees shall have the status of children of married employees. "Common-law" spouses as defined in the terms of the plan shall have the same status as legally married spouses.				
ACCESS AND PARTICIPATION REQUIREMENTS	Shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.
EMPLOYEE BENEFIT SCHEDULES	Shall not vary by marital status.	Lump sum benefits shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.
INCREASED BENEFIT SCHEDULES BASED ON THE EXISTENCE OF DEPENDENT/SURVIVING CHILDREN	Shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.	Shall not vary by marital status.
INCREASED BENEFIT SCHEDULES BASED ON THE EXISTENCE OF ADULT DEPENDENTS	Shall be allowed to vary by marital status with regard to dependent spouses only.	N/A	Income benefits shall be allowed to vary by marital status.	N/A	Shall be allowed to vary by marital status.
INCREASED BENEFIT SCHEDULES BASED ON THE EXISTENCE OF SURVIVING ADULTS	Shall be allowed to vary by marital status.				
EMPLOYEE CONTRIBUTION RATES	Shall not vary by marital status.		Shall not vary by marital status except for surviving spouses' income benefits where they shall be allowed to vary by marital status.		Shall not vary by marital status, except for dependent spouses' benefits where they shall be allowed to vary by marital status.
EMPLOYER CONTRIBUTION RATES	Shall not vary by marital status except for surviving spouses' and dependent spouses' benefits where they shall be allowed to vary on the basis of marital status.				Shall not vary by marital status except in proportion to the differences in required premiums.

PROVISION	PENSION	INSURANCE				HEALTH & MEDICAL
		LIFE	SHORT-TERM DISABILITY	LONG-TERM DISABILITY		
A Normal pensionable date 65+	Shall not vary by age	Shall not vary by age	Shall not vary by age	Shall not vary by age	Shall not vary by age	Shall not vary by age
C Normal pensionable date below 65	Shall be allowed to vary by age if existing employees above the normal pensionable date cannot continue to accrue benefits for current years of service	Shall not vary by age	Shall not vary by age	Shall not vary by age	Shall be allowed to vary by age if existing employees above the normal pensionable date do not have continuing coverage	Shall not vary by age
BENEFIT SCHEDULES	Shall be allowed to vary by age according to The Pension Benefits Act	Compulsory plans/features	Voluntary plans/features	Shall not vary by age	Shall not vary by age	Shall not vary by age
VESTING	Shall be allowed to vary by age according to The Pension Benefits Act	Shall not vary by age	N/A	N/A	N/A	N/A
PENSIONABLE DATES	Shall be allowed to vary by age	N/A	N/A	N/A	N/A	N/A
EMPLOYEE CONTRIBUTION RATES	Shall not vary by age, except for money-purchase and profit-sharing plans, and voluntary additional contributions	Shall not vary by age, except for voluntary employee-pay-all plans/features, where they shall be allowed to vary both in relation to the benefit schedule available, and on an actuarial basis	Shall not vary by age, except for voluntary employee-pay-all plans/features, where they shall be allowed to vary on an actuarial basis only	Shall not vary by age except for voluntary employee-pay-all plans/features, where they shall be allowed to vary on an actuarial basis only	Shall not vary by age except for voluntary employee-pay-all plans/features, where they shall be allowed to vary on an actuarial basis only	Shall not vary by age
EMPLOYER CONTRIBUTION RATES	Shall be allowed to vary by age according to The Pension Benefits Act	Compulsory plans/features	Voluntary plans/features	Shall be allowed to vary by age on an actuarial basis only, and only in order to achieve equal benefits	Shall be allowed to vary by age on an actuarial basis only, and only in order to achieve equal benefits	Shall not vary by age

